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March 2, 2009

**BY ELECTRONIC FILING**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Suite TW-A325  
Washington, DC 20554

**Re: Access Fiber Solutions, Inc. Annual Customer Proprietary Network Information  
Certification for 2008; EB Docket No. 06-36**

Dear Ms. Dortch:

Enclosed for filing in the above-referenced docket, please find the 2008 Annual 47 C.F.R. §64.2009(e) Customer Proprietary Network Information Certification for Access Fiber Solutions, Inc. (“AFS”) and an accompanying statement regarding AFS’s operating procedures.

Please do not hesitate to contact me should you have any questions.

Sincerely,

SQUIRE, SANDERS & DEMPSEY L.L.P.

/s/ Bruce Olcott

Bruce A. Olcott

Joshua T. Guyan

Counsel for Access Fiber Solutions, Inc.

Enclosure

cc: Federal Communications Commission, Enforcement Bureau (2 copies by U.S. mail)

Best Copy and Printing, Inc. (1 copy by electronic mail to FCC@BCPIWEB.com)

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**  
**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008

Date filed: March 2, 2009

Name of company covered by this certification: Access Fiber Solutions, Inc.

Form 499 Filer ID: 822874

Name of signatory: Michael G. Starner

Title of signatory: President

I, Michael G. Starner, certify that I am President of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed:



Michael G. Starner  
President

**Access Fiber Solutions, Inc.**

CPNI STATEMENT

Access Fiber Solutions, Inc. ("AFS") provides a limited point-to-point leased fiber optic Wide Area Network ("WAN") to a single school district pursuant to a public contract with a flat monthly rate. AFS does not receive, obtain or have access to CPNI, and therefore, is in compliance with the Commission's CPNI Rules, 47 C.F.R. §§ 64.2001 *et seq.*

AFS provides a leased fiber optic WAN service to the Waynesboro Area School District ("School District") to connect School District buildings pursuant to a public contract. The service offers 1 Gigabit of capacity for voice, video or data between the School District buildings. AFS essentially provides lighted fiber optic communications lines to the School District. AFS does not switch or route the traffic; it only transports the School District's Ethernet. The School District provides all Local Area Network and WAN switches and AFS provides the 3COM Gigabit Interface Converter.

AFS is not aware of what services pass through the fiber optic capacity provided and does not have access to such information. The School District may use all of the 1 Gigabit of capacity or none, or anything in between. As an example, in any given month, AFS does not know when calls are made, how often or to whom using the capacity provided. Finally, AFS's invoices to its customer are all pursuant to a flat monthly rate detailed in a public contract.

Simply put, AFS does not have access to or collect CPNI from the School District and will never have access to or receive the School District's CPNI. No pretexter could obtain any information from AFS about the School District or its use of the service that is not already publicly available or that would allow a pretexter to access the School District's private communications records.